

STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent assigned to the Cleveland Division, Canton Resident Agency of the Federal Bureau of Investigation. In my duties as a special agent, I have participated in investigations of, among other things, violent crimes, threats, gangs, drugs, domestic and international terrorism, and other federal offenses, including the execution of arrest and search warrants. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

FACTS SPECIFIC TO JAMIE WRIGHT

On January 6, 2021, Jamie Wright, identified further below, was present on the East Front of the U.S. Capitol Building. Wright could be seen wearing a black hooded jacket and a red hat with “Trump 2020” written on it, as shown in Image 1.



Image 1

On January 6, 2021, Wright was present outside the barricades on the East Front of the U.S. Capitol. Third-party photos and videos show that at approximately 1:45 p.m. Wright along with others pushed the barricades that outlined the restricted perimeter against officers protecting the Capitol building. (Images 2, 3, and 4.)



Image 2



Image 3



Image 4

After this initial push, officers were able to reestablish the barricades. However, CCTV video from the Capitol shows that approximately 2 minutes later, Wright grabbed and pulled the same barricades from officers as they continued to try and hold the crowd back. (Image 5.)



Image 5

Third-party video appears to show Wright engaging in this same barricade pull. (Image 6.)



Image 6

A few minutes later, Wright again attempted to grab the bike rack barricades from officers. (Image 7.)



Image 7

This time, the footage shows that he and other rioters successfully took the barricade and moved it back into the crowd, near the flowerbeds behind them.

At approximately 2:00 p.m., CCTV shows Wright again tried to grab barricades from officers on the police line. At the same time, rioters to Wright's left pushed the barricades against officers. (Image 8.)



Image 8

This time the rioters pushing the barricades successfully breached the barricades and police line. Once the barricades were breached, the crowd, including Wright, was free to move forward to the Capitol building. Wright turned to the crowd behind him and ushered others forward by waving his hand right before he advanced. (Image 9.)



Image 9

Shortly after making it into the restricted perimeter, however, Wright stopped his advance and moved a barricade out of the way of the rioters. (Image 10.)



Image 10

Wright then moved forward to the Capitol again waiving people forward with him. (Image 11.)

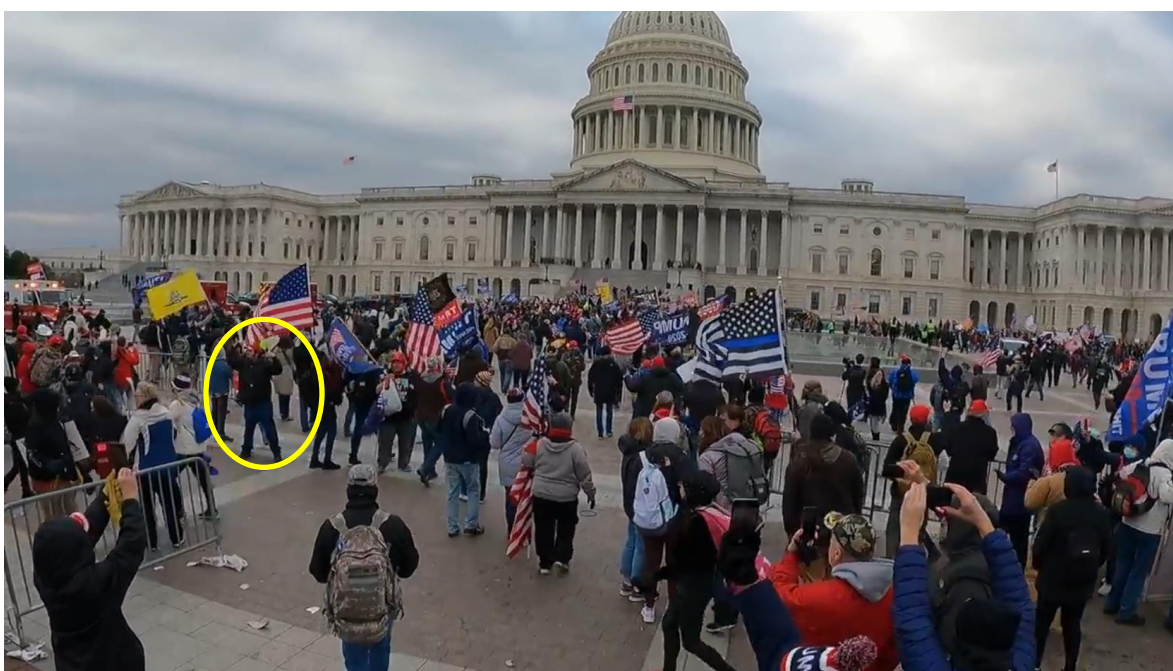


Image 11

Wright made it to the terrace of the Capitol building where third-party video shows that he again waived rioters forward. (Image 12.)



Image 12

IDENTIFICATION OF JAMIE WRIGHT

After the riot activity of January 6, 2021, FBI Cleveland, Canton Resident Agency opened an investigation into Canton, Ohio subject John Douglas Wright (“D. Wright”), Jamie Wright’s father. D. Wright was arrested on May 3, 2021 and indicted by a Federal Grand Jury on May 5, 2021 on charges related to entering the U.S. Capitol Building, including Title 18 United States Code, Section 231(a)(3), Civil Disorder and Title 18, United States Code, Section 1512(c)(2), Obstruction of an Official Proceeding. Case No. 21-cr-341. On August 2, 2022, D. Wright pled guilty to Title 18, United States Code, Section 1512(c)(2), Obstruction of an Official Proceeding and was sentenced on March 6, 2023 to forty nine months in federal prison.

As part of the investigation into D. Wright, a federal search warrant was issued in the United States District Court for the District of Columbia for the Facebook account belonging to D. Wright, username doug.wright.108. The search warrant was issued on March 9, 2021, and results were returned on March 15, 2021.

These Facebook records show that on January 8, 2021, a few days after the riot, D. Wright shared a zoomed in version of Image 2, stating “I GOING TO SEND A PICTURE OF ME JANIE AND CLAYTON TO SHOW TO HIM.” (Image 13.) Based on this, your affiant believes that D. Wright purports that the photo shows him, “Janie”—which your affiant believes is a misspelled reference to Wright’s son, Jamie Wright—and “Clayton”—who your affiant believes is a reference to Clay Norris, who has since been arrested for crimes related to January 6 (Case No. 24-cr-358)—pushing a police barrier at the U.S. Capitol Building. Your affiant has added a yellow circle around Jamie Wright, a green circle around D. Wright, and a red circle around Clay Norris.



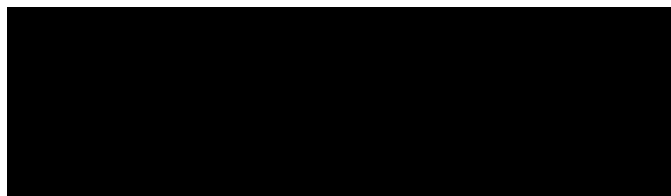
Image 13

Your affiant is familiar with both D. Wright and Norris because your affiant arrested them on May 3, 2021 and May 3, 2024, respectively. Your affiant observed an individual consistent in appearance with the person circled in yellow in the above photos at the sentencing of D. Wright. Given the context that it was his father's sentencing, and based on a comparison with the Ohio driver's license photograph of Jamie Wright and Facebook profile pictures for an account believed to belong to Jamie Wright, which I have reviewed, your affiant believes it was Jamie Wright who he saw.

Based on the foregoing, your affiant submits that there is probable cause to believe that Jamie Wright violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do so; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that Jamie Wright violated 40 U.S.C. § 5104(e)(2)(D), which makes it a crime to willfully and knowingly utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress.

Your affiant submits there is probable cause to believe that Jamie Wright violated 18 U.S.C. 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of Section 231 of Title 18, a federally protected function means any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Secret Service's protection of the Vice President and his family and the Capitol Police's protection of the U.S. Capitol.



Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 21st day of October 2024.

MOXILA A. UPADHYAYA
U.S. MAGISTRATE JUDGE